

ORIGINAL(1)
PC
S/2UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HARRY E. WILLIAMS, JR.
319 CARAVAN COURT
MIDDLETON, PA 17057

(Enter above the full name of plaintiff in this action)

V.

PENNSYLVANIA TURNPIKE

COMMISSION
PO BOX 67676
HARRISBURG, PA 17106-7676

(Enter above the full name of defendant(s) in this action)

COMPLAINT

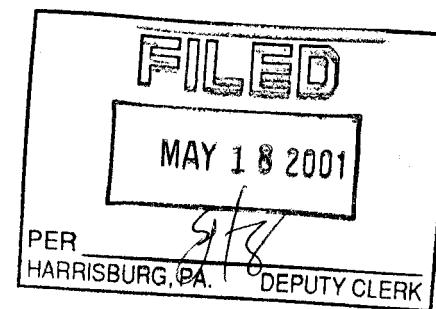
1. The plaintiff HARRY E. WILLIAMS, JR., a citizen of the County of DAUPHIN
 State of Pennsylvania, residing at 319 CARAVAN COURT, MIDDLETON, PA 17057

wishes to file a complaint under TITLE VII OF THE CIVIL RIGHTS ACT
 (give Title No, etc.)

OF 1964 AS AMENDED, 42 U.S.C. 2000 E, ET SEQ.

2. The defendant(s) is or are PENNSYLVANIA TURNPIKE COMMISSION
PO BOX 67676 HARRISBURG, PA 17106-7676

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper exhibits that give further information of your case, attach them to this completed form. Use as much space as you need. Attach extra sheet(s) if necessary.)



3.

(Continued) IN 1999, I FILED A COMPLAINT WITH PHRC-DOCKET # E-94646-D - EEOC CHARGE # 17 FAO 1545. MY COMPLAINT WAS AMENDED ON 1-13-2000. I FILED AFTER I WAS PASSED OVER A MANAGEMENT POSITION BECAUSE I OPPOSED THE UNFAIR TREATMENT OF DISCRIMINATION AGAINST A BLACK FEMALE WHO FILED TWO COMPLAINTS OF DISCRIMINATION BASED ON RACE, SEX, & RETALIATION IN MARCH & JUNE OF 1999. THE DOCKET #'S ARE: E-90815-D & E-92038-D. MANAGEMENT INFORMED ME NOT TO HELP THAT "DUMB F----- NIGGER TERRI EDWARDS IF YOU VALUE YOUR JOB OF 19 YEARS." THIS OFFENDS ME TO THIS DAY & DIDN'T APPRECIATE THE INTIMIDATION THAT MANAGEMENT TRIED TO CONVEY.

4. WHEREFORE, plaintiff prays that: FIND THE DEFENDANT GUILTY OF
(State what you wish the Court to do)

DISCRIMINATION BASED ON SEX, RETALIATION, & INTIMIDA-
TION. TO OBTAIN SALARY DIFFERENCE OF TWO MALES WHO
WERE PROMOTED TO THE POSITION OF COMMUNICATIONS CENTER
DUTY OFFICER IN 1999 THAT WERE OBVIOUSLY LESS QUALIFIED
THAN I, PAY DIFFERENCE FROM 1999 TO PRESENT IN MY
CURRENT POSITION. RECEIVE A WRITTEN & PUBLIC APOLOGY
FOR THEIR ACTIONS.

Harry E. Williams Jr.
(Signature of plaintiff)

319 CARAVAN COURT
Street Address

MIDDLETOWN, PA 17057
City, Zip Code

717-944-4770
Telephone Number

I AM RESPECTFULLY REQUESTING THE FOLLOWING BE SUBPEONAEAD:

RONALD P. FRANK, COMMUNICATIONS CENTER DUTY OFFICER (RETIRED)

PAUL HECKMAN, RADIO OPERATOR I

JOSEPH R. SULLIVAN, OPERATIONS CENTER MANAGER (RETIRED)

MICHAEL KENNEDY, DED (RETIRED)

WILLIAM CAPONE, DIRECTOR CUSTOMER SERVICE

DALE WICKARD, COMMUNICATIONS CENTER DUTY OFFICER

FRED JUMPER, COMMUNICATIONS CENTER DUTY OFFICER

DAN BRETMAN, OPERATIONS CENTER MANAGER

JOHN STEWART, DIRECTOR OF MAINTENANCE

JOSEPH FERGUSON, DIRECTOR OF HAZARDOUS MATERIALS

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HARRY E WILLIAMS, JR
(Plaintiff)

v.

PA TURNPIKE COMMISSION
(Defendant)

Affidavit/Declaration
In Support of Request
To Proceed
In Forma Pauperis

I, HARRY E WILLIAMS, JR, certify that I am the plaintiff in the above entitled case; that in support of my motion to proceed without being required to prepay fees, costs, or give security therefor, I state that because of my poverty I am unable to pay the costs of said proceeding or to give security therefor; that I believe I am entitled to redress.

I further state that the responses which I have made to the questions and instructions below are true and correct.

1. Are you presently employed? Yes No

a. If the answer is yes, state the amount of your salary or wages per month and give the name and address of your employer.

\$34,560 YEAR PENNSYLVANIA TURNPIKE COMMISSION

B. If the answer is no, state the date of last employment and the amount of the salary and wages per month which you received.

2. Have you received within the past twelve months any money from any of the following sources?

a. Business, profession or form of self-employment?
Yes No

b. Rent payments, interest or dividends?
Yes No

c. Pensions, annuities or life insurance payments?
Yes No

d. Gifts or inheritances?
Yes No

e. Any other sources?
Yes No

If the answer to any of the preceding questions is yes, describe each source of money and state the amount received from each during

the past twelve months.

3. Do you own any cash, or do you have any money in a checking or savings account? Yes No
If the answer is "yes" to any of the above, describe each source and the amount involved.

4. Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property, excluding ordinary household furnishings and clothing? Yes No

If the answer is yes, describe the property and state its approximate value.

MORTGAGE FOR MOBILE HOME # THIS 35,000 YR APPROXIMATE VALUE
CAR PAYMENT # 8,000 BLUE BOOK VALUE ON DODGE CARAVAN

5. List the persons who are dependent upon you for support; state your relationship to those persons and indicate how much you contribute toward their support.

WIFE, DAUGHTER, & GRANDSON DEPEND ON ME FOR
TOTAL SUPPORT

I understand that a false statement or answer to any questions in this affidavit/unsworn declaration will subject me to penalties for perjury.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on MAY 17, 2001

Harry E. Williams Jr.
Signature of Plaintiff